

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ABDIKARIM KARRANI,

Plaintiff,

v.

JETBLUE AIRWAYS CORPORATION, a
Delaware corporation,

Defendant.

No.: 2:18-cv-01510-RSM

DEFENDANT JETBLUE AIRWAYS
CORPORATION'S RESPONSE TO
PLAINTIFF'S THIRD MOTION TO SEAL

Plaintiff's filed the third motion to seal for the following testimony and records filed
as part of his opposition to JetBlue's Motion for Summary Judgment:

1. Page 2—Captain Ouillette and First Officer Cheney Deposition Testimony
2. Page 4—2016 Incident Reports, Dkt. #48
3. Page 5—2016 Incident Reports, Dkt. #48
4. Page 11—Crewmember Wilkinson's deposition testimony
5. Page 15—2016 Incident Reports, Dkt. #48
6. Exhibit 1A—First Officer Cheney's deposition testimony
7. Exhibit 2A—Captain Ouillette's deposition testimony
8. Exhibit 5A—Crewmember Wilkinson's deposition testimony

Since filing this motion, this Court has ordered the 2016 Incident Reports filed as Dkt. #48 to
be unsealed with a passenger's name and identifying information redacted. *See* Dkt. #76.
Additionally, JetBlue has agreed to filing crewmember Wilkinson's deposition testimony

DEFENDANT JETBLUE AIRWAYS CORPORATION'S RESPONSE
TO PLAINTIFF'S THIRD MOTION TO SEAL
(NO. 2:18-cv-01510-RSM) - 1

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1 without seal. Pitsch Decl. Ex. A (6/17–6/18 E-mails between Caryn Geraghty Jorgensen and
2 Mark Rose). Accordingly, the only remaining items subject to this motion to seal are the
3 deposition testimony excerpts of First Officer Cheney and Captain Ouillette. As noted by
4 Plaintiff's counsel, this testimony is being reviewed by the Transportation Security
5 Administration (TSA) for Sensitive Security Information (SSI). *See* Dkt. #67 at 3. To date,
6 neither party has received a response from the TSA regarding this testimony. JetBlue therefore
7 respectfully requests this testimony remain under seal until the TSA review is completed as
8 required by the Department of Homeland Security Appropriations Act of 2007, Pub. L. No.
9 109-295, 120 Stat. 1355, 1382 (Oct. 4, 2006). *See* 49 C.F.R. § 1520 *et seq.*; *Ibrahim v. Dept.*
10 *of Homeland Security*, 669 F.3d 983, 998 (9th Cir.2012); *see also* Department of Homeland
11 Security, *DHS/TSA/PIA-008 - Sensitive Security Information for Use in Litigation*,
12 <https://www.dhs.gov/publication/sensitive-security-information-use-litigation>.

13 DATED: July 1, 2019.

14
15 MILLS MEYERS SWARTLING P.S.
16 Attorneys for JetBlue Airways Corporation

17 By: /s/Samantha Pitsch
18 Caryn Geraghty Jorgensen
19 WSBA No. 27514
20 John Feters
21 WSBA No. 40800
22 Samantha Pitsch
23 WSBA No. 54190

24 DEFENDANT JETBLUE AIRWAYS CORPORATION'S RESPONSE
25 TO PLAINTIFF'S THIRD MOTION TO SEAL
26 (NO. 2:18-cv-01510-RSM) - 2

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CERTIFICATE OF SERVICE

I certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to:

John P. Sheridan, jack@sheridanlawfirm.com, jamie@sheridanlawfirm.com,
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I further certify that I mailed a true and correct copy of the foregoing to the following non-CM/ECF participant:

and correct copy of the foregoing to the following non-CM/ECF participant:

N/A

DATED this 1st day of July 2019.



Legal Assistant

DEFENDANT JETBLUE AIRWAYS CORPORATION'S RESPONSE
TO PLAINTIFF'S THIRD MOTION TO SEAL
(NO. 2:18-cv-01510-RSM) - 3

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